



414 Nicollet Mall
Minneapolis, MN 55401

April 1, 2019

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: MOTION REQUESTING CHANGES TO PROGRAM REPORTING
REQUIREMENTS COMMUNITY SOLAR GARDENS
DOCKET NO. E002/M-13-867

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits this Motion to the Minnesota Public Utilities Commission, requesting changes to the Solar*Rewards Community program reporting requirements. We do not suggest any significant material changes to the program information that we are required to report, but propose to reduce the sequence of reporting and to combine reporting to reduce duplicative filings. Pursuant to Minn. R. 7829.0410, any opposition to this motion must be filed and served on the service list in this docket within 14 days of the motion filing.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Jessica Peterson at jessica.k.peterson@xcelenergy.com or (612) 330-6850 if you have any questions regarding this filing.

Sincerely,

/s/

SHAWN WHITE

MANAGER, DSM & RENEWABLE REGULATORY STRATEGY AND PLANNING

Enclosures

c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

MOTION REQUESTING CHANGES TO
PROGRAM REPORTING REQUIREMENTS
COMMUNITY SOLAR GARDENS
DOCKET NO. E002/M-13-867

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MOTION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits this Motion to the Minnesota Public Utilities Commission (Commission), requesting changes to the Solar*Rewards Community program reporting requirements. We do not suggest any significant material changes to the program information that we are required to report, but propose to reduce the sequence of reporting and to combine reporting to reduce duplicative filings. Pursuant to Minn. R. 7829.0410, any opposition to this motion must be filed and served on the service list in this docket within 14 days of the motion filing.

I. STREAMLINE TOWARDS ANNUAL REPORTING

A. Move to Annual Reporting

The Solar*Rewards Community program has several monthly and annual reporting requirements that have been established in the past four years in several separate Commission Orders. Certain information must be posted on the program's website, while other information must be filed in Docket 13-867. We propose to streamline significant parts of this reporting to one annual report.

The annual report for the program includes detailed information on program metrics, such as program costs (deposit, application fee, participation fee, metering fee); solar gardens (size, location, subscriber groups); complaints and their resolution; bill credits earned and paid; application process; and lessons learned and potential modifications to the program.¹ We do not propose any changes to this content.

Originally, all monthly reporting requirements were related to an initial cohort of 427 Solar*Rewards Community applications received during the first weeks after the program was launched on December 12, 2014. The Commission's February 13, 2015 Order required that Xcel Energy "shall file monthly updates on the status of the initial cohort of 427 solar-garden applications, reflecting the following information: the number of initial solar-garden applications commissioned and/or still active and related MW capacity, categorized by county." Later, the Commission has added monthly reporting requirements that apply to all solar garden applications, and the Company has also voluntarily included information in the monthly reports for all active solar garden applications, not just the initial cohort.

The original purpose of monthly reporting no longer applies as all of the initial 427 projects are now either operational or were cancelled along the way. When the Solar*Rewards Community program began, there were challenges to deal with new processes and a larger than anticipated number of applications. However, the program has evolved and matured since its inception when the initial monthly reporting was established, and we believe that in the program's current state annual reporting and website updates would provide sufficient transparency and information to interested stakeholders and the public. Therefore, we propose modifications to streamline any current monthly or quarterly reporting into a more comprehensive annual report. Moving to one annual report will also reduce the amount of resources needed for ongoing program reporting.

The Commission's November 16, 2018 Order adopted a residential adder for the value-of-solar (VOS) bill credit rate for a two-year term, for vintage years 2019 and 2020. The Order specified several monthly reporting requirements, including reporting separately VOS subscription metrics; reporting amounts of unsubscribed

¹ These annual reporting requirements were established in the Commission's April 7, 2014 ORDER REJECTING XCEL'S SOLAR-GARDEN TARIFF FILING AND REQUIRING THE COMPANY TO FILE A REVISED SOLAR-GARDEN PLAN, Order Point 23.

energy and payments for that energy; and reporting incremental bill credit payments for residential adders. We also propose to move these monthly reporting requirements to one annual report, which would then mean that we would no longer file separate monthly program reports in Docket 13-867.² We acknowledge, however, that the Commission may prefer to receive reporting on these particular VOS-related items on a monthly basis once these details are available.³

B. Website Details

The Commission has also requested that Xcel Energy publish certain information regarding program applications on the program website. We propose to continue posting this information on the website, including the number and size of active and completed community solar garden applications by county. We also propose to publish online a monthly program dashboard, which summarizes the status of applications in the program and gives updates on any significant program changes or news. Attachment A includes an example of current dashboard.

The Company is also currently required to publish substation and queue position for each solar rewards community application on the program website. We propose to discontinue posting this information separately for community solar garden applications, as the full interconnection queue will be publicly available under the new interconnection process for distributed energy resources (DER). We discuss this in more detail in Section II below.

II. REMOVE DUPLICATIVE REPORTING

The Minnesota Distributed Energy Resources Interconnection Process (MN DIP) will replace Xcel Energy's current interconnection process and will apply to applications that were submitted on or after June 17, 2019. The MN DIP will introduce a single queue for all DER interconnections and add new reporting requirements. The Commission's August 13, 2018 Order⁴ addressed implementation

² We will continue to file all minutes from the S*RC Implementation Workgroup meetings in Docket No. 13-867.

³ It is important to note that subscriber details are unavailable until a project has been completed. For projects that are complete under the 2019 VOS, these details may not be available until 2021.

⁴ Docket No. E999/CI-16-521, ORDER ESTABLISHING UPDATED INTERCONNECTION PROCESS AND STANDARD INTERCONNECTION AGREEMENT, August 13, 2018.

of the MN DIP and at Order Point 20 specified the following requirements for reporting:

On March 1, until at least 2022, Minnesota Power, Otter Tail Power, Xcel Energy, and Dakota Electric shall each file a report with the Commission on interconnections that occurred during the preceding calendar year. This report shall include, at minimum: (a) Facility capacity; (b) DER type (technology); (c) Date of application submittal; (d) Date application deemed complete; (e) Date and disposition at applicable milestones in the interconnection process including initial review, supplemental review, system-impact study, facilities study, interconnection agreement, and permission to operate; (f) Final process track (simplified, fast-track, or study); (g) Number of pre-application reports requested and processed; (h) A narrative of how the process is working and where there is potential for improvement by the utility or interconnection applicants; and (i) For facilities of greater than 20 kW, the variance between the cost estimate provided in the facilities-study report and the actual cost of upgrades, including an explanation for variances that fall outside a +/- 20% range.

These new general reporting requirements regarding DER interconnections include several items that are currently reported separately for community solar garden applications only. Since these applications will be subject to the future general DER interconnection reporting, we propose to eliminate separate, duplicative reporting for the Solar*Rewards Community program and file the required information annually for all DER interconnections in one report. As the Commission ordered, this report will be separate from the annual Distributed Generation Interconnections report.⁵

The MN DIP also requires that the single queue for all DER interconnections is published on our website and updated at least monthly. The queue must be available in a sortable spreadsheet format and include detailed information, such as capacity, type of DER, location, process track, and status in the process.⁶ Therefore, we propose to discontinue posting a separate queue for S*RC applications only on our website.

⁵ Under Minn. Statute 216B.1611, Minnesota utilities submit an annual report on distributed generation interconnection with the utility's distribution system. These reports are filed in annual dockets ending in -10 (ex. 18-10, 19-10). Commission staff combines these reports for stakeholder review.

⁶ Details of the public DER interconnection queue are included in MN DIP Section 1.8.4.

III. SUMMARY OF PROPOSED CHANGES

The table below summarizes current Solar*Rewards Community program reporting requirements and our proposed changes. We request that the Commission issue an Order to adopt our proposed reporting requirements as described below.

Table 1: Summary of Current Reporting Requirements and Proposed Changes

	Commission Order	Current Reporting Requirement	Proposed Reporting Requirement
1	April 7, 2014 Order, Order Point 3.c	Xcel shall make information on the total number of pending and approved applications and their size available on its website.	Continue to provide information on program website.
2	September 17, 2014 Order, Order Point 9	Xcel shall, in reporting on the application process, include information on what percentage of projects were finished within the 24-month deadline for project completion.	Continue to provide information <i>annually</i> .
3	February 13, 2015 Order, ⁷ Order Point 3	Xcel shall file <i>monthly</i> updates on the status of the initial cohort of 427 solar-garden applications, reflecting the following information: the number of initial solar-garden applications commissioned and/or still active and related MW capacity, categorized by county.	Initial cohort completed. Provide information <i>annually</i> , and monthly on program website.
4	August 6, 2015 Order, Order Point 1 (2.2.a.ii)	The Company shall post on the S*RC page of its website the size, county, substation, and queue position of each Community Solar Garden application on a monthly basis.	Eliminate separate reporting under the Solar*Rewards Community program because corresponding information is reported in the annual DER interconnection report and the DER queue is updated monthly on our website.

⁷ ORDER CLARIFYING SOLAR-GARDEN APPLICATION PROCESS.

	Commission Order	Current Reporting Requirement	Proposed Reporting Requirement
5	August 6, 2015 Order, Order Point 2	Xcel shall, as part of its <i>monthly</i> updates to the Commission in this docket, a. identify each instance in which an application was deemed incomplete or otherwise returned to the applicant for additional information, the additional information being sought from the applicant, and the amount of additional time taken for processing the application; and b. identify each instance in which the Company has not met a Section 10 tariff interconnection process timeline, or has otherwise restarted the timeline, and the reason for not meeting or restarting the timeline.	Provide information <i>annually</i> for those applications that are not subject to MN DIP. For applications subject to MN DIP, eliminate separate reporting under the Solar*Rewards Community program because corresponding information is reported in the annual DER interconnection report.
6	August 6, 2015 Order, Order Point 7	Xcel shall provide a breakdown by customer class of solar-garden subscribers and update this breakdown <i>quarterly</i> .	Provide information <i>annually</i> .
7	November 1, 2016 Order, Order Point 5	Xcel shall report cost variances between the indicative cost estimate and the actual costs for the total project, the substation costs, and the distribution costs. For each of these costs that fall outside a +/-20% range, Xcel shall provide a detailed explanation for the variance. Xcel shall report this information to the Commission within 30 days of the actual cost being provided to the developer in its next <i>monthly</i> community-solar-garden update report.	Provide information <i>annually</i> .
8	November 16, 2018 Order, Order Point 5	Xcel must report separately on value of solar garden project subscription metrics, in addition to the program-wide metrics currently reported, as part of its Community Solar Garden <i>monthly</i> updates and annual reports.	Provide information <i>annually</i> .
9	November 16, 2018 Order, Order Point 6	Xcel must report <i>monthly</i> in its Community Solar Garden updates on the total number of projects receiving unsubscribed energy payments, the total amount of unsubscribed energy, and the total amount paid for that energy in the reporting month.	Provide information <i>annually</i> .
10	November 16, 2018 Order, Order Point 7	Xcel must report <i>monthly</i> on the total incremental bill credit payments for any residential adder adopted by the Commission.	Provide information <i>annually</i> .

CONCLUSION

The Solar*Rewards Community program has matured and the MN DIP will be implemented in June 2019 – we believe this is an opportunity to reconsider and update Solar*Rewards Community program reporting requirements. We propose to discontinue separate monthly program reports and to eliminate any duplicative reporting that will be covered by MN DIP reporting requirements. We request that the Commission adopts our proposed changes to current program reporting requirements as described in this Motion.

Dated: April 1, 2019

Northern States Power Company

Minnesota Solar*Rewards Community®

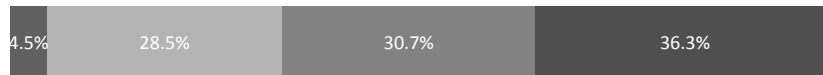
Status Report | March 2019

PROJECT STATUS

- New Applications (2019) = 10 (19 remain active)
- Total No. of Applications under the VOS = 205

February 1, 2019	Project Sites	MW
Active Applications	311	378
Completed Projects	177	516
↓ PROGRESS SUMMARY ↓		
Application Stage	22	21
Study Phase	139	143
In process	120	117
Interconnection Agreement Issued	14	18
<i>Restudies in Progress</i>	5	8
Design & Construction Phase	141	206

PROJECT SITES BY STAGE



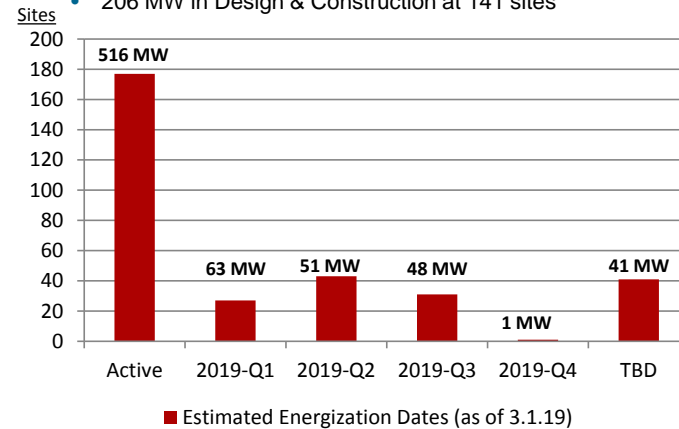
■ Application Stage ■ Study Phase ■ Design & Construction ■ Commercial Operation

PROGRAM UPDATE

- Extreme weather has lead to several energization and acceptance testing cancellations. Xcel Energy is diligently working to reschedule all cancelled tests in a timely manner while maintain all upcoming scheduled tests.
- SRCMN Developer Resource Page completed its revamp to better outline the interconnection process and provide additional support for garden operators
- One IE dispute is before the commission; one proceeding through mediation process; and one commission complaint in process with the commission

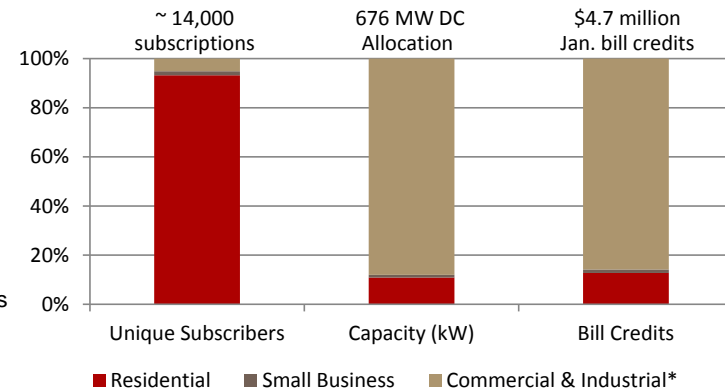
SOLAR GARDENS IN DESIGN & CONSTRUCTION

- 206 MW in Design & Construction at 141 sites



ACTIVE SOLAR GARDENS

- \$94,578,228.31 – Bill Credits paid (full production months through Jan 2019)
- Details below are as of January 2019



CERTIFICATE OF SERVICE

I, Lynette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota; or

xx by electronic filing.

Docket No.: E002/M-13-867

Dated this 1st day of April.

/s/

Lynette Sweet
Regulatory Administrator

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